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COUNSEL FOR MOVANTS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	
SUPERIOR AIR PARTS, INC.	§	CASE NO. 08-36705-BJH-11
	§	
Debtor.	§	Chapter 11

**AFFIDAVIT OF WILLIAM O. ANGELLEY
IN SUPPORT OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

STATE OF CALIFORNIA §
 §
COUNTY OF LOS ANGELES §

William O. Angelley, upon first being duly sworn, deposes and says:

1. My name is William O. Angelley. I am over twenty-one (21) years of age. I have never been convicted of a felony or a crime of moral turpitude. I am fully competent to make this Affidavit. I have personal knowledge of the facts set forth in this Affidavit.

2. I am an attorney at Kreindler & Kreindler LLP (“Kreindler”) located at 707 Wilshire Blvd., 41st Floor, Los Angeles, CA 90017. Kreindler represents the Movants in the various lawsuits on file which are the subject of the Motion for Relief from the Automatic Stay (the “Motion”) [Docket No. 204].

3. A description of the Movants and their lawsuits is as follows:

a. On November 4, 2006, Justin Whitefield, Branden Hughes and one other person were killed when the aircraft in which they were flying crashed near Danville, Arkansas. The aircraft was a Piper PA-32-300, and its FAA Registration Number was N15852. The crash was caused by an in-flight failure of the subject aircraft's engine, which was the result of, among other things, the separation of one or more of the engine's cylinders, connecting rods and/or the failure of one or more related parts. Prior to the crash, the engine was overhauled and outfitted with the Debtor's parts and components, including the connecting rod bolts and related equipment. Clyda Whitefield (as personal representative of the Estate of Justin Whitefield), Mark Hughes, Amy Hughes and Brandt Hughes (through Amber Henson, his Next Friend, as Next of Kin of Branden Hughes) (collectively, the "Whitefield and Hughes Plaintiffs") filed suit against the Debtor, among other Defendants, in the District Court of Pontotoc County, State of Oklahoma, Case No. CJ-2008-864 on August 18, 2008. The Whitefield and Hughes Plaintiffs' causes of action against the Debtor include negligence, strict products liability, and breach of warranty. A true and correct copy of the complaint is attached hereto as **Exhibit "A."** As of the Petition Date, discovery in the case had not yet been concluded.

b. On November 4, 2006, Jennifer Parton was a passenger in an aircraft that was owned by Justin Whitefield and Jeremy Rich, and believed to be operated by Brandon Hughes. Jennifer Parton was killed when the aircraft in

which they were flying crashed near Danville, Arkansas. The crash was caused by an in-flight failure of the subject aircraft's engine. Prior to the crash, the engine was overhauled and outfitted with the Debtor's parts and components. Chris Reser (as Father and Guardian of Logan Scott Reser, a minor, and Taylor Shalom Reser, a minor; as personal representative of the Estate of Jennifer Parton; and on behalf of the Legal Heirs of the Estate of Jennifer Parton) (the "Reser Plaintiffs") filed suit against the Debtor, among other Defendants, in the District Court of Pontotoc County, State of Oklahoma, Case No. CJ-2008-812 on November 3, 2008. The Reser Plaintiffs' causes of action against the Debtor include negligence, products liability, and breach of warranty. A true and correct copy of the complaint is attached hereto as **Exhibit "B."** As of the Petition Date, discovery in the case had not yet been concluded.

c. On August 10, 2005, Ricky Manning was killed when the Bell OH-58A helicopter he was piloting crashed. The investigation of the crash revealed that the power turbine output shaft to pinion gear coupling had fractured. Metallurgical examination of the broken coupling by the National Transportation Safety Board showed evidence of fatigue. Debtor, by itself and through several subcontractors, was responsible for the design and manufacture of the failed coupling. Cheryl Kirkwood (individually and as guardian ad litem of Cory Manning, a minor, as successor in interest and as personal representative of the Estate of Ricky Manning) and Taylor Manning (individually, as successor in interest and as a personal representative of the Estate of Ricky Manning) (the "Kirkwood Plaintiffs") filed suit against the Debtor, among other Defendants, in

the Superior Court of the State of California for the County of Los Angeles, Northern District, Case No. MC018515 on September 12, 2007. The Kirkwood Plaintiffs' causes of action against the Debtor include negligence, products liability and breach of warranty. A true and correct copy of the complaint is attached hereto as **Exhibit "C."** As of the Petition Date, discovery was underway in the case.

d. On May 24, 2005, Alfred W. Zadow was piloting a Cessna R182 aircraft, registration number N756PN ("subject aircraft"), on a planned flight from Malone, New York to Islip, New York when Alfred W. Zadow reported "an oil pressure problem" to New York Approach Control and that "the engine is seizing." Soon thereafter Mr. Zadow told New York Approach Control that "we've lost all power." The subject aircraft subsequently crashed in New Fairfield, Connecticut, resulting in severe personal injuries to and the death of Alfred W. Zadow and his spouse-passenger Donna M. Zadow. The Debtor supplied replacement and component parts for Lycoming aircraft engines, including but not limited to, connecting rod bearings, as installed in the subject aircraft's engine. Elizabeth Luyster (as Executor and Administrator of the Estates of Alfred W. Zadow and Donna M. Zadow) (the "Zadow Plaintiff") filed suit against the Debtor, among other Defendants, in the United States District Court, Southern District of New York, Case No. 06 CV 4166 on March 30, 2007. The Zadow Plaintiff's causes of action against the Debtor include negligence, strict liability and breach of warranty. A true and correct copy of the complaint is attached hereto as **Exhibit "D."** As of the Petition Date, discovery was underway

in the case.

4. Upon information and belief, Movants' above-described claims are covered by one or more of the Debtor's insurance policies.

5. To the extent that I subsequently discover any facts bearing on this Affidavit, this Affidavit will be supplemented and those facts will be disclosed at the earliest opportunity.

SIGNED AND SWORN TO UNDER THE PENALTIES OF PERJURY this 21st day
of May, 2009.



William O. Angelley